

# Exhibit D

**BERNABEI & WACHTEL, PLLC**

ATTORNEYS AT LAW  
1775 T STREET, N.W.  
WASHINGTON, D.C. 20009

LYNNE BERNABEI  
DAVID WACHTEL  
ALAN R. KABAT

202.745.1942  
FAX: 202.745.2627  
WWW.BERNABEIPLLC.COM

PETER M. WHELAN  
LAUREN R. S. MENDONSA  
NADIA E. SAID ■  
MATTHEW E. RADLER ▲  
■ ADMITTED IN IL ONLY  
▲ ADMITTED IN VA ONLY

By Email and First Class Mail  
November 11, 2013

Robert T. Haefele, Esquire  
Motley Rice, LLC  
28 Bridgeside Boulevard  
Mount Pleasant, S.C. 29464

Re: *In re* Terrorist Attacks on September 11, 2001, No. 1:03-MD-1570 (GBD/FM).

Dear Bob:

Enclosed please find paper and electronic copies of the responses to the jurisdictional discovery requests served on Dr. Al-Turki, Dr. Al-Swailem, Dr. Al-Obaid, Dr. Naseef, Dr. Basha, and Mr. Al-Buthe, with the document production on the CD.

Please note that Dr. Naseef is in critical condition, recovering from surgery, and we have been unable to determine what documents he may have. Hence, his responses are in the nature of a placeholder, and we intend to supplement the responses upon his return to good health, and when he is able to review his documents.

We also anticipate producing one or more tranches of documents for Mr. Al-Buthe over the next week or two.

Sincerely,

*/s/ Alan R. Kabat*

Alan R. Kabat

Enc.

cc: MDL-1570 counsel